

April 27, 2012

**BY ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, D.C. 20554

Re: *Developing a Unified Intercarrier Compensation Regime, et al.*,  
CC Docket Nos. 01-92 and 96-45, WC Docket Nos. 03-109, 05-  
337, 07-135 and 10-90, WT Docket No. 10-208, and GN Docket  
No. 09- 51 – Ex Parte Notice

Dear Ms. Dortch:

Leonard Steinberg of Alaska Communications Systems Group, Inc. and I met with Michael Steffen of the Chairman's office on April 25, 2012, and with Steve Rosenberg, Ted Burmeister and Patrick Halley of the Wireline Competition Bureau on April 24, 2012. Dave Blessing of Parrish Blessing & Associates also attended the April 24 meeting. In both of these meetings, ACS discussed its concerns about the modeling efforts associated with Phase II Connect America Fund ("CAF") support for price cap carriers. ACS noted that a high proportion of customers in Alaska are served by lines costing more than \$256 per month, and expressed concern that the CQBAT model does not adequately capture Alaska costs, nor are its data inputs and mechanisms accessible to third parties. The Wireline Competition Bureau staff suggested that ACS submit a list of points that ACS believes require additional explanation by the CQBAT proponents, which ACS intends to do in a further filing in these proceedings.

ACS also raised with Mr. Steffen several other issues pending on reconsideration or in the Further Notices of Proposed Rulemaking that accompanied the Commission's *CAF-ICC Transformation Order* in the above-captioned proceedings.<sup>1</sup>

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<sup>1</sup> *Connect America Fund et al.*, Report and Order and Further Notice of Proposed Rulemaking in WC Docket No. 10-90 *et al.*, FCC 11-161 (rel. Nov. 18, 2011) ("*CAF/ICC Transformation Order*"). See Petitions for Reconsideration of Action in Rulemaking Proceeding, FCC Report No. 2945 (rel. Jan. 12, 2012), 77 Fed. Reg. 2625 (Jan. 25, 2012).

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These issues are summarized on the enclosed document, which was provided to Mr. Steffen at the meeting.

Please direct any questions regarding this matter to me.

Very truly yours,

Karen Brinkmann  
*Counsel to Alaska Communications Systems Group,  
Inc.*

cc: Steve Rosenberg  
Ted Burmeister  
Patrick Halley  
Michael Steffen  
Christine Kurth  
Angela Kronenberg